STATE OF COLORADO

John W. Hickenlooper, Governor
Christopher E. Urbina, MD, MPH
Executive Director and Chief Medical Officer

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
Phone (303) 692-2000
Located in Glendale, Colorado

Laboratory Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

http://www.cdphe.state.co.us

Colorado Department
of Public Health
and Environment

October 12, 2012

Matt Francis
Environmental Restoration
Fax (636) 680-2556

Re: Variance Request – Eaton Sugar Beat Factory (Work Area 3A), CO Section III.W.

Dear Mr. Francis:

The variance request for Eaton Sugar Beat Factory (Work Area 3A), CO Section III.W., has been **APPROVED** based on your re-submitted information.

- Please provide CDPHE with the results of your Air Monitoring data for each day. Please e-mail cdphe.asbestos@state.co.us as soon as you have the laboratory data available.

If you have any questions or comments, please feel free to contact me at (303) 691-4959.

Sincerely,

Robert Szynskie

Robert Szynskie
Air Pollution Control Division
Asbestos/Indoor Air Quality Unit
303-691-4959

APPROVED
DATE 10/12/12 CDPHE RKS

Colorado Department of Public Health and Environment

Regulation No. 8, Part B Variance Request Form

Permit Coordinator
Colorado Dept. of Public Health and Environment
APCD-IE-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530
Phone: 303-692-3100
Fax: 303-782-0278
asbestos@state.co.us

APPROVED
DATE 10/12-12 CDPHE

Please submit a $50 review fee for each Variance Request Form submitted.
The fee must accompany the Variance Request Form at the time of submission.
The fee will not be refunded if the variance request is denied or withdrawn.

Name of Facility: Eaton Sugar Beet Factory (ESBF) Work Area 3A	Facility Location: Eaton CO	
GAC/Consultant submitting request: Environmental Restoration	Phone # (303) 994 6611	Fax # ( ) email
E-mail Address: m.francis@erllc.com	Permit Number (if already issued): 11WE-4691A-EX	

For the above referenced location(s) we are requesting a variance from the requirements of the following Section(s) of Regulation No. 8, Part B: PLEASE CITE THE SPECIFIC SECTION NUMBERS.

Section(s)	Title(s) (if any)	Page(s)
III.W.	Structurally Unsound Building	58

Describe your proposed alternative procedures for this particular project. Explain in detail why you believe this section of the regulation is "not practical and feasible" for this project; OR explain in detail how the "proposed alternative procedures will provide equivalent control of asbestos". Provide photographs, diagrams, and/or independent reports to substantiate your statement. Supportive digital photographs may be e-mailed to asbestos@state.co.us

In reference to the attached structural engineer's report, ERLLC is notifying CDPHE that abatement activities cannot be safely conducted in Work Area 3A of the ESBF. ERLLC previously submitted a Variance Request (VR) to clean a portion of this area and demolish the remainder. While working on a response to the denial of that VR, it was determined that the area continues to degrade and current conditions and access limitations make it unsafe to perform any cleaning of the area prior to demolition. At this time Area 3A is the only portion of the ESBF facilty that ERLLC believes will require a variance based on the Section III.W. - Structurally Unsound Buildings provision.

Area 3A is the upper floor of Area 3 (approx 140'X40') which is located between the Lime Kiln building (Area 10) and the attached metal structure (Area 2). The lower floor, Area 3, was previoulsy put under containment cleaned and cleared. The engineer identified the South wall of Area 3A as failing and, as such, presents eminent danger to workers conducting activities adjacent to the wall. Additionally, the roof has collapsed over the South side of the area making it not possible to safely construct overhead containment due to structural components being tied into the failing South wall. The failing roof also continues to sluff chunks of concrete and currently has several large pieces (100+lbs) of concrete ready to fall if disturbed. The only access to Area 3A is via a catwalk from the main process building. The only door is directly beneath part of the failing roof.

Samples taken in Area 3A have shown asbestos contamination in the dirt and debris including plaster from the collapsed ceiling and non-friable gaskets left over from the Area's former use as a parts room. The area does not contain any TSI.

ERLLC will demolish the structurally unsound section of the facility under wet conditions beginning with soaking the area with Gorilla-Snot or other similar encapsalant 24hrs prior to any disturbance. A constant umbrella of water applied by personnel placed in manlifts utilizing fire hoses with spray nozzels will be

prevelant during all handling of the material from the point of initial disturbance to final loadout into double lined end-dumps or rolloff containers. The fire hydrant at the West entrance of the site will be utilized to provide water for water trucks. Amendment will be added directly to the water truck resevoir with each load obtained. Due to the nature of the demolition work, it is believed that installing misters on the demolition equipment will be less effective than the fire nozzels due to the high potential for damage to the misters while handling debris. ER will install engineered erosion controls to mitigate any runoff from the demolition operations. Erosion controls will include some or all of the following items:

- ☐ Installation of silt fence around demolition zone to control run off to adjacent areas
- ☐ Construct temporary berms if necessary to control run off / run on

ER will utilize HEPA-equipped hurricane vaccums and/or pumps to remove water prior to filtering through 5 micron cartridges for to discharge into the local sanitary sewer. Soil underlying contaminated runoff will be excavated and managed as other site soils identified for removal (see Soil Management Plan). If water migrates into Area 3 (below), Area 2 (connected South) or Area 10 (connected North) the impacted parts of those areas will be re-cleaned and cleared by AMS or removed as part of the demolition. All contaminated erosion control products will be removed and disposed as asbestos contaminated waste.

During all demolition activities, eight air-monitoring stations will be utilized. Four air monitors will be placed at intervals along each of the West and East sides. The North and South boundaries are sealed attached structures, therefore air sampling locations are not applicable. Additionally, each manlift crew and equipment operator will be equipped with a personnel monitor. This arrangement places ten (minimum) total samples at the closest areas possible to the work location. The stationary samples along each side will be spaced at approximately 40' intervals no more than 45' from the building. The personnel samples will move around the work zone inside the perimeter set by the stationary monitors. The air samples will be collected daily and analyzed by PCM analysis with the two highest values after analysis being rolled-over to TEM. It is anticipated that demolition and loadout of this are will be completed in five 10hr work days.

The AMS or competent person on site will monitor site weather conditions throughout the project every 30 minutes and during gusts. If at any time sustained winds reach or exceed 12 mph averaged over 10 minutes or wind gusts exceed 20 mph as determined by handheld instrumentation, demolition activities will cease for at least 10 minutes until conditions improve for at least 10 minutes. In addition, demolition/loading may cease if visible dust emissions are produced until engineering controls can be adjusted to adequately control the dust. All wind speed measurements will be taken in close proximity to, and representative of, the active work area. Natural wind breaks are currently in place on all three windward sides as the building is shielded from the West by the main factory, from the South by Area 2, and from the North by Area 10. The East side will be utilized for equipment staging and loading. 2-Story windshields would not be practical to install or necessary on the open East side.

This Area 3A demolition work will be performed prior to the soils removal tasks planned for the site. As part of the soils removal process the areas surrounding Area 3A will be addressed in accordance with the site Soil Management Plan. This plan includes provisions for air monitoring specialist (AMS) clearance of work zones. Clearance will happen prior to any site restoration activities.

Disturbed soil areas will be restored with clean fill material currently staged on site. As directed by the OSC, ER will procure and place a topsoil material. All material will be sampled per OSC direction, before being allowed to be used on-site. ER will consult with EPA / START on obtaining confirmation sample/s from the borrow source material and what analytical parameters will be required to verify the imported material is free of contaminants.

Seeding and straw will complete re-vegetation; the mixture will be approved by the OSC. ER will be performing the seeding and straw of the restored areas. It is anticipated to utilize a seed mixture native to the area that will be primarily drought-tolerant grasses. Re-vegetation activities may not be performed if site-wide demolition activities are to be started soon after ER completes demolition of Area 3A.

All equipment leaving the exclusion zone shall be thoroughly decontaminated using wet methods at a decontamination pad designed to collect rinse water for removal and filtration. Decontamination will begin with gross removal conducted in a way to ensure that all residual soil/ACM debris is removed. Final decontamination will occur using wet methods including washing or cleaning with brushes and squeeges. All

water generated during the decontamination process will be collected, filtered and reused onsite for wetting, or discharged into sanitary sewer system. Waste materials such as rags will be or disposed of as ACM waste. Personnel will utilize the current decon shower trailers with travel to/from the work zone restricted to a lined path or through areas to be cleaned in the future. If personnel are routed along a lined path they will drop their outer layer protective coverall into a proper waste package as they leave the immediate work area.

I, the undersigned, hereby certify that the information contained in this request is true and understand that deliberately providing false or misleading information may result in the suspension or revocation of my certification in addition to the imposition of civil and/or criminal penalties:

Signature:	Print Name: Matt Francis	Date: ~~05/09/12~~ 09/27/12

CDPH&E use only

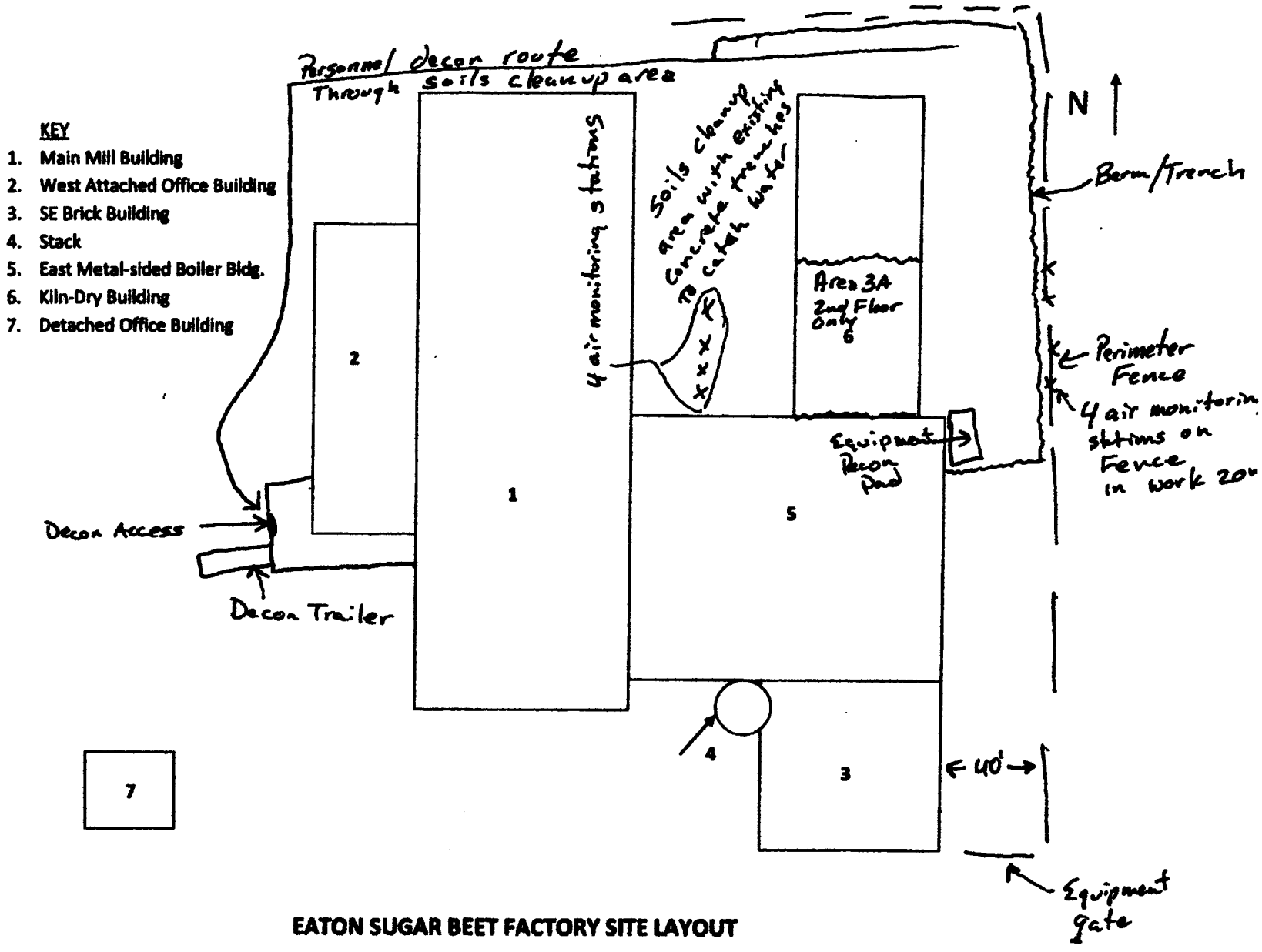
Reviewed by: JWA, CLB, WTB, RWJ, RCL & LAS | Form of Payment & # N/A - Paid Previous [Code]

Date: 10-12-12 Approved X Denied ___ Additional Provision(s)? YES (see below) NO

See Attached letter

Note: This variance is null and void if all additional provisions are not met.

APPROVED
DATE 10-12-12 JAS



EATON SUGAR BEET FACTORY SITE LAYOUT

Not to Scale

URS

Memorandum

Date: April 23, 2012

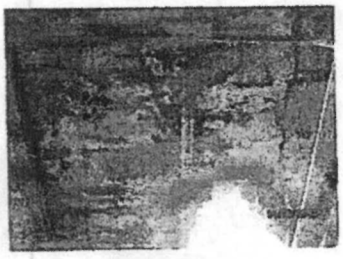
To: Matt Francis, Sr. Project Manager, Environmental Restoration, LLC (ER)

From: Andy Paddock, P.E. , URS Structural Engineer

Subject: **Eaton Sugar Beet Factory, Structural Recommendations No. 2**

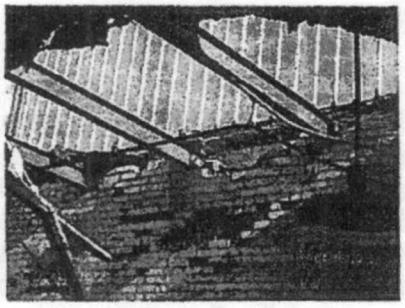
URS was asked to meet with ER staff at the project site on April 16, 2012 and to provide structural assistance with the assessment of the existing floor structure within the Main Mill Building, where ER planned to utilize a heavy (3,000 lb. plus) motorized electric pallet jack to aid with debris material removal throughout the building. The areas observed focused on the 2nd ,3rd, and 4th floors of the Main Mill building where existing walkways, running north and south along the building, are planned to be used as "haul routes" to remove debris. Zone 3a and zone 2 were also observed.

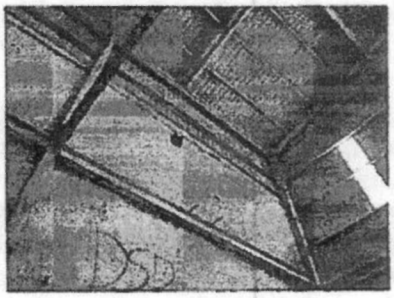
The deterioration observed throughout the floors of the Main Mill Building typically consisted of deteriorated concrete and exposed, corroded steel wire reinforcing. This deterioration is likely due to continued exposure to moisture which corroded the steel and damaged/delaminated the concrete cover on the underside of the slabs. This type of deterioration has an impact on the slabs structural capacity, specifically with regard to resisting punching shear from large point loads applied over a small area. Evidence of this can be seen in the photographs below and is the main reason it is not recommended to use the electric pallet jack on these floors.



Do not use motorized electric pallet jack on floors with exposed reinforcing. Floor areas with exposed wire reinforcing, or those suspected of having corroded reinforcing, should be accessed with caution and if concentrated point loads in excess of foot traffic are expected, supplemental measure should be taken. These measures need to provide some level of "redundancy" or "support" to keep something from creating or falling through a hole in the concrete slabs and could consist of sheets of plywood or expanded wire mesh panels spanning over the steel support beams below.

Zone 3a, adjacent to Zone 2, was observed due to concern about the roof structure and its supporting masonry wall. The wall in question is at the south end of Zone 3a, and abuts the metal building framing of Zone 2. As shown in the photograph below, this load bearing wall is supporting the steel beams which support the concrete roof deck.





Zone 3a is very unstable and should be considered structurally unsound. Implementation of abatement work may endanger personnel who will be removing asbestos from the facility. Additional load and vibrations on or near this wall may result in collapse of the wall which is already partially collapsed and leaning into Zone 2. Temporary shoring should be located under each steel roof beam, and continued below the floor to the slab on grade in Zone 3 below, before any work is done in this area. Care should be taken when working in this area to ensure that personnel are in Zones 2 and Zone 3 are not injured should the wall collapses and drop bricks below.

cc: Jeremiah Ervin, Senior Environmental Scientist, URS
Peter Stevenson, EPA

Colorado Department of Public Health and Environment

Regulation No. 8, Part B Variance Request Form

Submit form to:
Permit Coordinator
Colorado Dept. of Public Health and Environment
APCD-IE-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530
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Name of Facility: Eaton Sugar Beet Factory (ESBF) Work Area 3A	Facility Location: Eaton CO	
GAC/Consultant submitting request: Environmental Restoration	Phone # (303) 994 6611	Fax # ( ) email
E-mail Address: m.francis@erllc.com	Permit Number (if already issued): 11WE-4691A-EX	

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In reference to the attached structural engineer's report, ERLLC is notifying CDPHE that abatement activities cannot be safely conducted in Work Area 3A of the ESBF. ERLLC previously submitted a Variance Request (VR) to clean a portion of this area and demolish the remainder. While working on a response to the denial of that VR, it was determined that the area continues to degrade and current conditions and access limitations make it unsafe to perform any cleaning of the area prior to demolition. At this time Area 3A is the only portion of the ESBF facilty that ERLLC believes will require a variance based on the Section III.W. - Structurally Unsound Buildings provision.

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+6 photos

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I, the undersigned, hereby certify that the information contained in this request is true and understand that deliberately providing false or misleading information may result in the suspension or revocation of my certification in addition to the imposition of civil and/or criminal penalties:

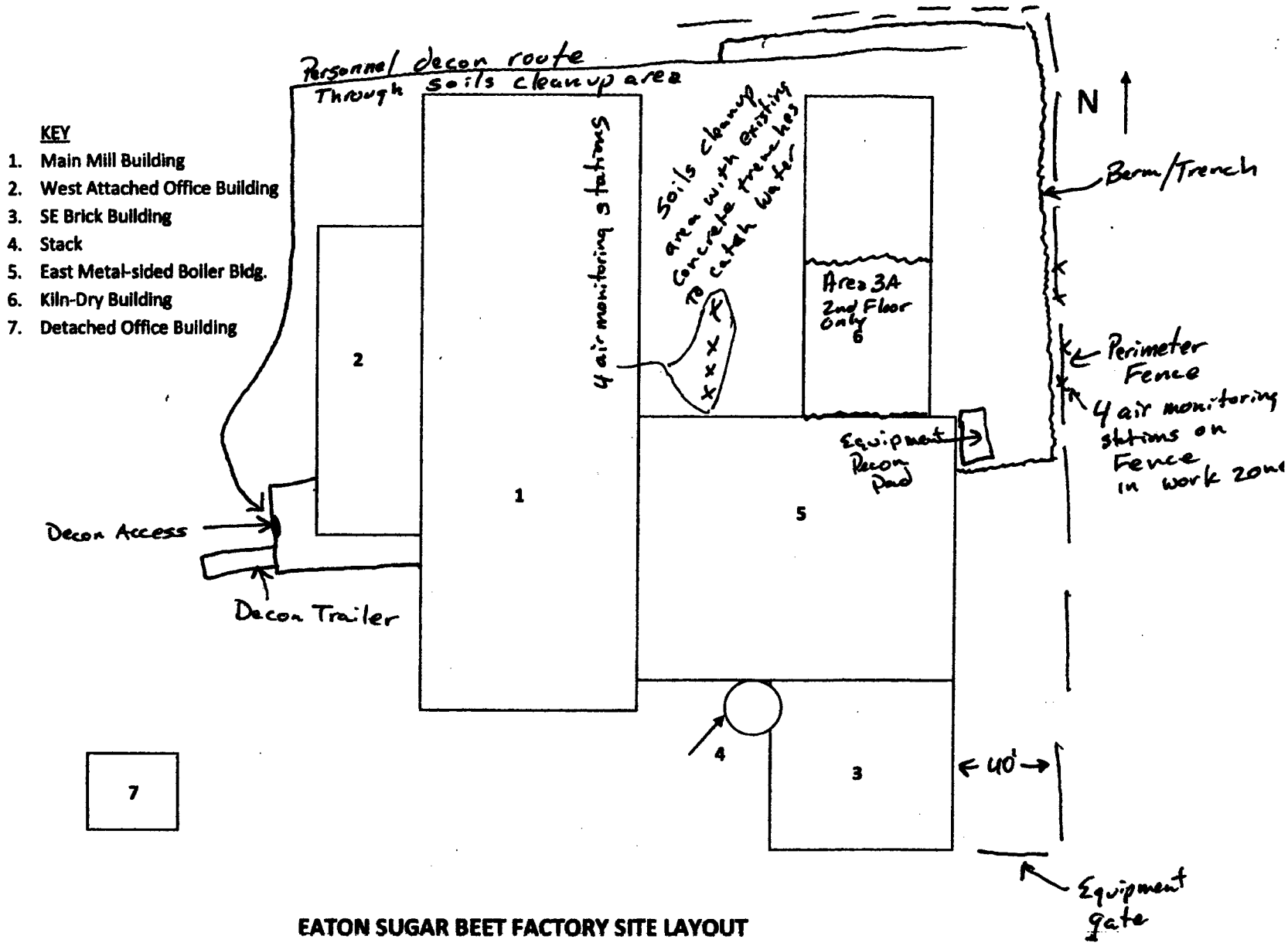
Signature:	Print Name: Matt Francis	Date: 09/27/12 ~~05/09/12~~

CDPH&E use only

Reviewed by: JWA, CLB, WTB, RWJ, RCL & LAS | Form of Payment & # | [Code]

Date: Approved___ Denied___ Additional Provision(s)? YES (see below) NO

Note: This variance is null and void if all additional provisions are not met.



EATON SUGAR BEET FACTORY SITE LAYOUT

Not to Scale

URS

Memorandum

Date: April 23, 2012

To: Matt Francis, Sr. Project Manager, Environmental Restoration, LLC (ER)

From: Andy Paddock, P.E. , URS Structural Engineer

Subject: **Eaton Sugar Beet Factory, Structural Recommendations No. 2**

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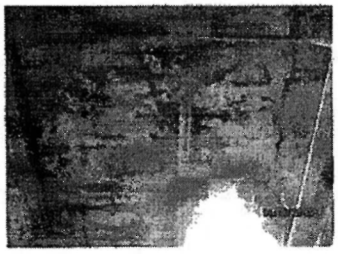

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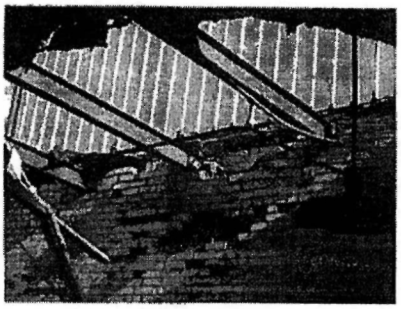

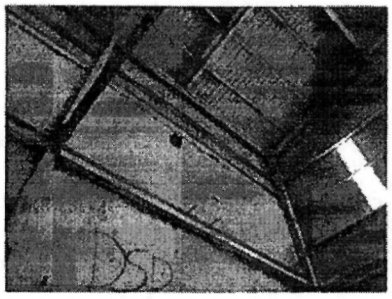

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cc: Jeremiah Ervin, Senior Environmental Scientist, URS
Peter Stevenson, EPA

Colorado Dept. of Public Health and Environment
APCD-IEP-B1
4300 Cherry Creek Drive S.
Denver, CO 80246-1530
Phone: 303-692-3100
Fax: 303-782-0278

Colorado Department of Public Health and Environment
REGULATION NO. 8. PART B
NOTICE OF INSPECTION

Date	Time In/Out	Inspector(s)	Facility Name/Address
9-25-12	12:30 / 1:00	Robert Szynskie	Eaton Sugar Beet Factory

Building Owner(s)	Contractor	Permit #	Person(s) Interviewed
Town of Eaton	E.R.	1WE-4691A-EX	Matt Francis / Pete Stevenson EPA-R8

Entry by Consent: ☐ Warrant: ☐

Reason for inspection: ☐ Routine Compliance ☐ Complaint ☒ Other (specify): Variance Review

OBSERVATIONS/COMMENTS:

Reviewed area of requested Variance.

- 2nd floor area structurally unsound Area 3A.

- Took Photos.

- Other abatement areas not looked at.

REQUIRED ACTIONS: None. - Robert.Szynskie@State.co.us

Were all problems resolved at the time of inspection? Y☐ N☐ N/A ☐; CDPHE follow-up needed? Y☐ N ☐

Samples (splits) taken? Y☐ N☐ Pictures taken? Y☐ N☐

Sample #'s thru Documents collected? Y☐ N☐

THE DIVISION WILL REVIEW THE INFORMATION COLLECTED DURING THIS INSPECTION AND A DECISION WILL BE MADE REGARDING COMPLIANCE WITH ASBESTOS REGULATIONS. THIS REVIEW MAY SUGGEST ADDITIONAL ITEMS REQUIRING FOLLOW UP.

Acknowledgement of Inspection

☒ **CONTRACTOR**
Print Company Name: Environmental Restoration LLC
Print Name: Luke Wisniewski
Sign Name: Luke Wisniewski

☐ **CONSULTANT** ☐ **OWNER** ☐ **OTHER**
Print Company Name:
Print Name:
Sign Name:

DIVISION INSPECTOR
Signature: Robert Szynskie
Signature:

Sheet ____ of ____

STATE OF COLORADO

John W. Hickenlooper, Governor
Christopher E. Urbina, MD, MPH
Executive Director and Chief Medical Officer

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
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Phone (303) 692-2000
Located in Glendale, Colorado

http://www.cdphe.state.co.us

Laboratory Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

Colorado Department
of Public Health
and Environment

September 06, 2012

Matt Francis
Environmental Restoration
Fax (636) 680-2556

Re: Variance Request – Eaton Sugar Beat Factory (Work Area 3A), CO Section III.W.

Dear Mr. Francis:

The variance request for Eaton Sugar Beat Factory (Work Area 3A), CO Section III.W., has been **DENIED** based on your submittal, due to the following:

- The wetting procedure described in the plan lacks detail and needs to be revised to include a description of: the use of amended water; the water supply that will be used at the site; what devices are going to be used to create the water "umbrella" (misters, fire hoses..?) and how water will be collected inside and outside the work area.
- The submitted plan states that Environmental Restoration may use erosion controls during the course of abatement. Erosion controls are required (not optional). In addition, all straw berms would need to be covered with poly and disposed of asbestos-containing waste.
- The air monitoring plan is insufficient and needs to include a detailed description of the justification of using four "compass points" instead of placing air samples as close to the point of operations as possible and why four samples are adequate.
- Clean fill cannot be added to the property until an Air Monitoring Specialist (AMS) performs a visual clearance to verify that all asbestos-containing debris has been removed from the site.
- A diagram should be included with the plan that includes but is not limited to the equipment decon area, the personnel decon area and the location of the berms.

These above listed items are not all inclusive, but an example of the deficiencies in your work plan.
If you have any questions or comments, please feel free to contact me at (303) 692-3184.

Sincerely,

Alexander D. Scherer
Asbestos/Indoor Air Quality Unit
Indoor Environment Program
Air Pollution Control Division
Phone: (303) 692-3184
Fax: (303) 782-0278
e-mail: alex.scherer@state.co.us

Colorado Department of Public Health and Environment

Regulation No. 8, Part B Variance Request Form

Submit form to:
Permit Coordinator
Colorado Dept. of Public Health and Environment
APCD-IE-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530
Phone 303-692-3100
Fax 303-782-0278
asbestos@state.co.us

Please submit a $50 review fee for each Variance Request Form submitted.
The fee must accompany the Variance Request Form at the time of submission.
The fee will not be refunded if the variance request is denied or withdrawn.

Name of Facility:	Facility Location:	
Eaton Sugar Beet Factory (ESBF) Work Area 3A	Eaton CO	
GAC Consultant submitting request: Environmental Restoration	Phone # (303) 994 6611	Fax # (636) 680 2556
E-mail Address: m.francis@erllc.com	Permit Number (if already issued): 11WE-4691A-EX	

For the above referenced location(s) we are requesting a variance from the requirements of the following Section(s) of Regulation No. 8, Part B: PLEASE CITE THE SPECIFIC SECTION NUMBERS.

Section(s)	Title(s) (if any)	Page(s)
III.W.	Structurally Unsound Building	58

Describe your proposed alternative procedures for this particular project. Explain in detail why you believe this section of the regulation is "not practical and feasible" for this project; **OR** explain in detail how the "proposed alternative procedures will provide equivalent control of asbestos". Provide photographs, diagrams, and/or independent reports to substantiate your statement. Supportive digital photographs may be e-mailed to asbestos@state.co.us

In reference to the attached structural engineer's report, ERLLC is notifying CDPHE that abatement activities cannot be safely conducted in Work Area 3A of the ESBF. ERLLC previously submitted a Variance Request (VR) to clean a portion of this area and demo the remainder. While working on a response to the denial of that VR, it was determined that the area continues to degrade and current conditions and access limitations make it unsafe to perform any cleaning of the area prior to demolition. At this time Area 3A is the only portion of the ESBF facilty that ERLLC believes will require a variance based on the Section III.W. - Structurally Unsound Buildings provision.

Area 3A is the upper floor of Area 3 (approx 140'X40') which is located between the Lime Kiln building (Area 10) and the attached metal structure (Area 2). The lower floor, Area 3, was previoulsy put under containment cleaned and cleared. The engineer identified the South wall of Area 3A as failing and, as such, presents eminent danger to workers conducting activities adjacent to the wall. Additionally, the roof has collapsed over the South side of the area making it not possible to safely construct overhead containment due to structural components being tied into the failing South wall. The failing roof also continues to sluff chunks of concrete and currently has several large pieces (100+lbs) of concrete ready to fall if disturbed. The only access to Area 3A is via a catwalk from the main process building. The only door is directly beneath part of the failing roof.

Samples taken in Area 3A have shown asbestos contamination in the dirt and debris including plaster from the collapsed ceiling and non-friable gaskets left over from the Area's former use as a parts room. The area does not contain any TSI.

ERLLC will demolish the structurally unsound section of the facility under wet conditions beginning with soaking the area with Gorilla-Snot or other similar encapsalant 24hrs prior to any disturbance. A constant umbrella of water applied by personnel placed in manlifts will be prevelant during all handling of the material

from the point of initial disturbance to final loadout into double lined end-dumps or rolloff containers. ER will install engineered erosion controls to mitigate any runoff from the demolition operations. Erosion controls may include the following items:

Installation of silt fence around demolition zone to control run off to adjacent areas
Construct temporary berms if necessary to control run off / run on
Straw bales or silt sacks placed around intake of storm sewers or ditch lines

Contaminated runoff that escapes the controls will be collected, and filtered through 5 micron cartridges prior to discharge into the local sanitary sewer. Soil underlying escaped contaminated runoff will be excavated and managed as other site soils identified for removal (see Soil Management Plan). If water migrates into Area 3 (below), Area 2 (connected South) or Area 10 (connected North) the impacted parts of those areas will be re-cleaned and cleared by AMS or removed as part of the demolition.

During all demolition activities, eight air-monitoring stations will be utilized. Four air monitors will be placed along each of the West and East sides. The North and South boundaries are sealed attached structures, therefore air sampling locations are not applicable. The air samples will be collected daily and analyzed by PCM analysis with the two highest values after analysis being rolled-over to TEM. It is anticipated that demolition and loadout of this are will be completed in five 10hr work days.

The AMS or competent person on site will monitor site weather conditions throughout the project every 30 minutes and during gusts. If at any time sustained winds reach or exceed 12 mph averaged over 10 minutes or wind gusts exceed 20 mph as determined by handheld instrumentation, demolition activities will cease for at least 10 minutes until conditions improve for at least 10 minutes. In addition, demolition/loading may cease if visible dust emissions are produced until engineering controls can be adjusted to adequately control the dust. All wind speed measurements will be taken in close proximity to, and representative of, the active work area. Natural wind breaks are currently in place on all three windward sides as the building is shielded from the West by the main factory, from the South by Area 2, and from the North by Area 10. The East side will be utilized for equipment staging and loading. 2-Story windshields would not be practical to install or necessary on the open East side.

Disturbed soil areas will be restored with clean fill material currently staged on site. As directed by the OSC, ER will procure and place a topsoil material. All material will be sampled per OSC direction, before being allowed to be used on-site. ER will consult with EPA / START on obtaining confirmation sample/s from the borrow source material and what analytical parameters will be required to verify the imported material is free of contaminants.

Seeding and straw will complete re-vegetation; the mixture will be approved by the OSC. ER will be performing the seeding and straw of the restored areas. It is anticipated to utilize a seed mixture native to the area that will be primarily drought-tolerant grasses.

All equipment leaving the exclusion zone shall be thoroughly decontaminated using wet methods at a decontamination pad designed to collect rinse water for removal and filtration. Decontamination will begin with gross removal conducted in a way to ensure that all residual soil/ACM debris is removed. Final decontamination will occur using wet methods including washing or cleaning with brushes and squeeges. All water generated during the decontamination process will be collected, filtered and reused onsite for wetting, or discharged into sanitary sewer system. Waste materials such as rags will be or disposed of as ACM waste. Personnel will utilize the current decon shower trailers with travel to/from the work zone restricted to a lined path or through areas to be cleaned in the future. If personnel are routed along a lined path they will drop their outer layer protective coverall into a proper waste package as they leave the immediate work area.

I, the undersigned, hereby certify that the information contained in this request is true and understand that deliberately providing false or misleading information may result in the suspension or revocation of my certification in addition to the imposition of civil and/or criminal penalties:

Signature:	Print Name: Matt Francis	Date: ~~05/09/12~~ 8/1/12

CDPH&E use only

Reviewed by: JWA, CLB, WTB, RWJ, RCL & LAS | Form of Payment & # | [Code]

Date: Approved___ Denied___ Additional Provision(s)? YES (see below) NO

Note: This variance is null and void if all additional provisions are not met.

URS

Memorandum

Date: April 23, 2012

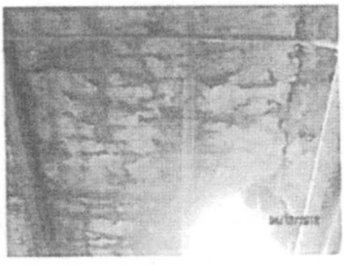
To: Matt Francis, Sr. Project Manager, Environmental Restoration, LLC (ER)

From: Andy Paddock, P.E. , URS Structural Engineer

Subject: **Eaton Sugar Beet Factory, Structural Recommendations No. 2**

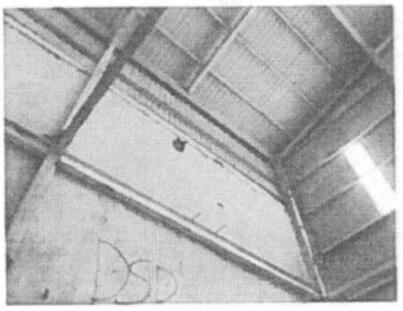
URS was asked to meet with ER staff at the project site on April 16, 2012 and to provide structural assistance with the assessment of the existing floor structure within the Main Mill Building, where ER planned to utilize a heavy (3,000 lb. plus) motorized electric pallet jack to aid with debris material removal throughout the building. The areas observed focused on the 2nd ,3rd, and 4th floors of the Main Mill building where existing walkways, running north and south along the building, are planned to be used as "haul routes" to remove debris. Zone 3a and zone 2 were also observed.

The deterioration observed throughout the floors of the Main Mill Building typically consisted of deteriorated concrete and exposed, corroded steel wire reinforcing. This deterioration is likely due to continued exposure to moisture which corroded the steel and damaged/delaminated the concrete cover on the underside of the slabs. This type of deterioration has an impact on the slabs structural capacity, specifically with regard to resisting punching shear from large point loads applied over a small area. Evidence of this can be seen in the photographs below and is the main reason it is not recommended to use the electric pallet jack on these floors.



Do not use motorized electric pallet jack on floors with exposed reinforcing. Floor areas with exposed wire reinforcing, or those suspected of having corroded reinforcing, should be accessed with caution and if concentrated point loads in excess of foot traffic are expected, supplemental measure should be taken. These measures need to provide some level of "redundancy" or "support" to keep something from creating or falling through a hole in the concrete slabs and could consist of sheets of plywood or expanded wire mesh panels spanning over the steel support beams below.

Zone 3a, adjacent to Zone 2, was observed due to concern about the roof structure and its supporting masonry wall. The wall in question is at the south end of Zone 3a, and abuts the metal building framing of Zone 2. As shown in the photograph below, this load bearing wall is supporting the steel beams which support the concrete roof deck.



Zone 3a is very unstable and should be considered structurally unsound. Implementation of abatement work may endanger personnel who will be removing asbestos from the facility. Additional load and vibrations on or near this wall may result in collapse of the wall which is already partially collapsed and leaning into Zone 2. Temporary shoring should be located under each steel roof beam, and continued below the floor to the slab on grade in Zone 3 below, before any work is done in this area. Care should be taken when working in this area to ensure that personnel are in Zones 2 and Zone 3 are not injured should the wall collapses and drop bricks below.

cc: Jeremiah Ervin, Senior Environmental Scientist, URS
Peter Stevenson, EPA

STATE OF COLORADO

John W. Hickenlooper, Governor
Christopher E. Urbina, MD, MPH
Executive Director and Chief Medical Officer

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
Phone (303) 692-2000
Located in Glendale, Colorado

http://www.cdphe.state.co.us

Laboratory Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

Colorado Department
of Public Health
and Environment

May 29, 2012

Matt Francis
Environmental Restoration
Fax (636) 680-2556

Re: Variance Request – Eaton Sugar Beat Factory Work Area 3: Section III.W.

Dear Mr. Francis,
The variance request for Eaton Sugar Beat Factory Work Area 3: Section III.W., has been **DENIED** based on your submittal, due to the following:

- The proposed plan and documents do not describe why a critical barrier cannot be established on the ceiling of the building.
- The proposed plan and documents do not describe why the walls of the structure cannot be cleaned with an airless sprayer. Can Manlifts not be used?
- The air sampling procedure method lacks specifics in regards to quantity of samples, location of samples and how many samples will be rolled over to TEM.
- What type and amount of asbestos-containing material is going to be left behind?
- What is the size of the area being abated?

These above listed items are not all inclusive, but an example of the deficiencies in your work plan.
If you have any questions or comments, please feel free to contact me at (303) 692-3184.

Sincerely,

Alexander D. Scherer
Asbestos/Indoor Air Quality Unit
Indoor Environment Program
Air Pollution Control Division
Phone: (303) 692-3184
Fax: (303) 782-0278
e-mail: alex.scherer@state.co.us

Area 3A Variance Request
Matt Francis
to:
Adams, Jeff W.
05/09/2012 02:58 PM
Cc:
Peter Stevenson, Luke Wisniewski, "Ervin, Jeremiah"
Hide Details
From: Matt Francis <m.francis@erllc.com>

To: "Adams, Jeff W." <Jeff.Adams@dphe.state.co.us>

Cc: Peter Stevenson/R8/USEPA/US@EPA, Luke Wisniewski <l.wisniewski@erllc.com>, "Ervin, Jeremiah" <jeremiah.ervin@urs.com>

2 Attachments

Area 3A Variance Request.pdf Eaton SBF Structutral Memo_2_ 4-23-12.pdf

Jeff
Attached is a variance request and engineers report for Area 3A of the Eaton Sugar Beet factory. Please review and let me know what you think. As always, I'm available at 303 994 6611 if you have any questions.
Thanks
Matt

Colorado Department of Public Health and Environment

Regulation No. 8, Part B Variance Request Form

Submit form to:
Permit Coordinator
Colorado Dept. of Public Health and Environment
APCD-IE-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530
Phone: 303-692-3100
Fax: 303-782-0278
asbestos@state.co.us

Please submit a $50 review fee for each Variance Request Form submitted.
The fee must accompany the Variance Request Form at the time of submission.
The fee will not be refunded if the variance request is denied or withdrawn.

Name of Facility:	Facility Location:	
Eaton Sugar Beet Factory (ESBF) Work Area 3A	Eaton CO	
GAC Consultant submitting request: Environmental Restoration	Phone # (303) 994 6611	Fax # (636) 680 2556
E-mail Address: m.francis@erllc.com	Permit Number (if already issued): 11WE-4691A-EX	

For the above referenced location(s) we are requesting a variance from the requirements of the following Section(s) of Regulation No. 8, Part B: PLEASE CITE THE SPECIFIC SECTION NUMBERS.

Section(s)	Title(s) (if any)	Page(s)
III.W.	Structurally Unsound Building	58

Describe your proposed alternative procedures for this particular project. Explain in detail why you believe this section of the regulation is "not practical and feasible" for this project; **OR** explain in detail how the "proposed alternative procedures will provide equivalent control of asbestos". Provide photographs, diagrams, and/or independent reports to substantiate your statement. Supportive digital photographs may be e-mailed to asbestos@state.co.us

In reference to the attached structural engineer's report, ERLLC is requesting to conduct abatement activities in Work Area 3A of the ESBF without cleaning the South wall or establishing containment. Area 3A is the upper floor of Area 3 which is located between the lime kiln building and Area 2. The engineer identified the South wall of Area 3A as failing and, as such, presents eminent danger to workers conducting activities adjacent to the wall. Additionally, the roof has collapsed over the South side of the area making it not possible to safely construct overhead containment due to structural components being tied into the failing South wall. ERLLC will remove ACM, contaminated dirt, and debris utilizing wet methods in conjunction with HEPA vacuuming in all portions of 3A outside of the potential fall zone of the failing south wall and directly underneath the failing roof. The remaining materials will be removed when the work zone undergoes wet demolition. At this time is is unknown if the demolition will take place during ERLLC's EPA-funded action, therefore this variance request only pertains to abatement activities.

During abatement activities, ERLLC will provide a minimum of 5 perimeter air monitoring locations around the exterior of Area 3A. The samples will be sent to an acredited lab for PCM analysis at the end of each work shift for expedited analysis. The sampling results will guide the abatement procedures utilized to ensure emissions are being adequately controlled. ERLLC will cover the window openings to minimize the potential for emissions related to wind interference, and stop work if wind in the work zone exceeds 12mph sustained or gusts of 20mph as measured by hand-held instruments within the work area. Work will also be stopped and methods reevaluated if visible emmissions are being created. Work will resume after a wind stoppage once the hand-held instrument has verified that gusts over 20mph have not occurred for at least 20 minutes and the 20 minute average sustained wind velocity is less than 12mph. Because Area 3A is sheltered from the wind by 4 walls and approximetly 70% of the original roof, wind is not expected to be an issue but the stated procedures will be utilized to verify.

At the conclusion of abatement activities in the safe work zones the AMS will be notified for a visual inspection to verify that no visible suspect dust or debris remains in the portion of the building cleaned. Because Area 3A is part of a major asbestos spill and portions will not be cleaned, final clearance through air sampling will not be conducted and Area 3A will remain a posted restricted area requiring Level C PPE for entry while it awaits demolition. The only access to 3A is via a catwalk from the main process building, so access can be effectively limited by installing plywood on both ends of the catwalk.

At this time, Area 3A is the only portion of the ESBF facilty that ERLLC believes will require a variance based on the Section III.W. - Structurally Unsound Buildings provision. Approval of this variance will not affect personnel decontamination procedures or disposal practices described in the original Project Design.

I, the undersigned, hereby certify that the information contained in this request is true and understand that deliberately providing false or misleading information may result in the suspension or revocation of my certification in addition to the imposition of civil and/or criminal penalties:

Signature:	Print Name: Matt Francis	Date: 05/09/12

CDPH&E use only

Reviewed by: JWA, CLB, WTB, RWJ, RCL & LAS | Form of Payment & # | [Code]

Date: Approved____ Denied____ Additional Provision(s)? YES (see below) NO

Note: This variance is null and void if all additional provisions are not met.

URS

Memorandum

Date: April 23, 2012

To: Matt Francis, Sr. Project Manager, Environmental Restoration, LLC (ER)

From: Andy Paddock, P.E. , URS Structural Engineer

Subject: **Eaton Sugar Beet Factory, Structural Recommendations No. 2**

URS was asked to meet with ER staff at the project site on April 16, 2012 and to provide structural assistance with the assessment of the existing floor structure within the Main Mill Building, where ER planned to utilize a heavy (3,000 lb. plus) motorized electric pallet jack to aid with debris material removal throughout the building. The areas observed focused on the 2nd ,3rd, and 4th floors of the Main Mill building where existing walkways, running north and south along the building, are planned to be used as "haul routes" to remove debris. Zone 3a and zone 2 were also observed.

The deterioration observed throughout the floors of the Main Mill Building typically consisted of deteriorated concrete and exposed, corroded steel wire reinforcing. This deterioration is likely due to continued exposure to moisture which corroded the steel and damaged/delaminated the concrete cover on the underside of the slabs. This type of deterioration has an impact on the slabs structural capacity, specifically with regard to resisting punching shear from large point loads applied over a small area. Evidence of this can be seen in the photographs below and is the main reason it is not recommended to use the electric pallet jack on these floors.

Do not use motorized electric pallet jack on floors with exposed reinforcing. Floor areas with exposed wire reinforcing, or those suspected of having corroded reinforcing, should be accessed with caution and if concentrated point loads in excess of foot traffic are expected, supplemental measure should be taken. These measures need to provide some level of "redundancy" or "support" to keep something from creating or falling through a hole in the concrete slabs and could consist of sheets of plywood or expanded wire mesh panels spanning over the steel support beams below.

Zone 3a, adjacent to Zone 2, was observed due to concern about the roof structure and its supporting masonry wall. The wall in question is at the south end of Zone 3a, and abuts the metal building framing of Zone 2. As shown in the photograph below, this load bearing wall is supporting the steel beams which support the concrete roof deck.

Zone 3a is very unstable and should be considered structurally unsound. Implementation of abatement work may endanger personnel who will be removing asbestos from the facility. Additional load and vibrations on or near this wall may result in collapse of the wall which is already partially collapsed and leaning into Zone 2. Temporary shoring should be located under each steel roof beam, and continued below the floor to the slab on grade in Zone 3 below, before any work is done in this area. Care should be taken when working in this area to ensure that personnel are in Zones 2 and Zone 3 are not injured should the wall collapses and drop bricks below.

cc: Jeremiah Ervin, Senior Environmental Scientist, URS
Peter Stevenson, EPA

FW: Area 3A Variance Request
Matt Francis
to:
Peter Stevenson
05/11/2012 09:02 AM
Hide Details
From: Matt Francis <m.francis@erllc.com>

To: Peter Stevenson/R8/USEPA/US@EPA

From: Adams, Jeff W. [mailto:Jeff.Adams@dphe.state.co.us]
Sent: Friday, May 11, 2012 8:48 AM
To: Matt Francis
Subject: RE: Area 3A Variance Request

Dear Matt:

Printed – And just a reminder, please don't move forward with the work until the variance is approved.

Please feel free to contact me if you have any further questions or comments.

Sincerely, Jeff Adams

Jeffrey W. Adams
Environmental Protection Specialist II
Indoor Environment Program
Air Pollution Control Division
Colorado Department of Public Health & Environment
(303) 692-3273 phone
(303) 782-0278 fax
www.cdphe.state.co.us/ap/asbestos

From: Matt Francis [mailto:m.francis@erllc.com]
Sent: Wednesday, May 09, 2012 2:58 PM

To: Adams, Jeff W.
Cc: stevenson.peter@epa.gov; Luke Wisniewski; Ervin, Jeremiah
Subject: Area 3A Variance Request

Jeff
Attached is a variance request and engineers report for Area 3A of the Eaton Sugar Beet factory. Please review and let me know what you think. As always, I'm available at 303 994 6611 if you have any questions.
Thanks
Matt

Confidentiality Warning: This e-mail and any attachments contain information intended only for the use of the individual or entity named above. If the reader of this e-mail is not the intended recipient or the employee or agent responsible for delivering it to the intended recipient, any dissemination, publication or copying of this e-mail is strictly prohibited. The sender does not accept any responsibility for any loss, disruption or damage to your data or computer system that may occur while using data contained in, or transmitted with, this e-mail. If you have received this e-mail in error, please immediately notify by return e-mail. Thank you

Structural Engineer Evaluation
Matt Francis
to:
Peter Stevenson
04/16/2012 06:40 PM
Cc:
Marilyn Smith, Luke Wisniewski
Hide Details
From: Matt Francis <m.francis@erllc.com>

To: Peter Stevenson/R8/USEPA/US@EPA

Cc: Marilyn Smith <m.smith@erllc.com>, Luke Wisniewski <l.wisniewski@erllc.com>

Pete
URS provided their structural engineer (Andy) to look at the building today. He was concerned about the floors throughout the main building. He has some recommendations he will make to allow for personnel, scaffolding and the light 1-man non-motorized lift to be used. However, I expect he will not endorse using the motorized pallet jack (weight 3100lbs unloaded) to be used at all. After looking at the condition of the floors more closely with him, I completely agree.

We also looked at Area 3A (parts room). The floors there could be braced, first in area 3 below and then over that bracing from floor to the roof beams in 3A. However, the brick wall attached to Area 2 is bowing out and there is a concern the entire course of bricks could come down. Something to think about is seeking a variance, based on that area being structurally unsound, to leave Area 3B for wet demolition. The engineer indicated he would support us if we sought such a variance. I would suggest we offer to do a wet gross removal of the debris on the floor without containment and then leave it for demo. That is something we can talk about when you're hear and after you've had some time to think about it.

Matt

Colorado Department of Public Health and Environment

Regulation No. 8, Part B Variance Request Form

Submit form to:
Permit Coordinator
Colorado Dept. of Public Health and Environment
APCD-IE-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530
Phone: 303-692-3100
Fax: 303-782-0278
asbestos@state.co.us

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Name of Facility:	Facility Location:	
Eaton Sugar Beet Factory (ESBF) Work Area 3A	Eaton CO	
GAC/Consultant submitting request: Environmental Restoration	Phone # (303) 994 6611	Fax # (636) 680 2556
E-mail Address: m.francis@erllc.com	Permit Number (if already issued): 11WE-4691A-EX	

For the above referenced location(s) we are requesting a variance from the requirements of the following Section(s) of Regulation No. 8, Part B: PLEASE CITE THE SPECIFIC SECTION NUMBERS.

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In reference to the attached structural engineer's report, ERLLC is notifying CDPHE that abatement activities cannot be safely conducted in Work Area 3A of the ESBF. Area 3A is the upper floor of Area 3 which is located between the Lime Kiln building and Area 2. The lower floor, Area 3, was previoulsy put under containment cleaned and cleared. The engineer identified the South wall of Area 3A as failing and, as such, presents eminent danger to workers conducting activities adjacent to the wall. Additionally, the roof has collapsed over the South side of the area making it not possible to safely construct overhead containment due to structural components being tied into the failing South wall. The failing roof also continues to sluff chunks of concrete and currently has several large pieces (100+lbs) of concrete ready to fall if disturbed. The only access to Area 3A is via a catwalk from the main process building. The only door is directly beneath part of the failing roof. ERLLC will not be placing employees in this work zone.

Samples taken in Area 3A have shown asbestos contamination in the dirt and debris including plaster from the collapsed ceiling and gaskets left over from the Area's former use as a parts room. As part of a major asbestos spill, all materials associated with Area 3A are considered friable asbestos. The area does not appear to contain any TSI.

At this time, Area 3A is the only portion of the ESBF facilty that ERLLC believes will require a variance based on the Section III.W. - Structurally Unsound Buildings provision. It is unknown if demolition of this area will occur under the current EPA-funded action. If so, ERLLC will provide CDPHE with a work plan for review that details air monitoring, work practices, etc.

I, the undersigned, hereby certify that the information contained in this request is true and understand that deliberately providing false or misleading information may result in the suspension or revocation of my certification in addition to the imposition of civil and/or criminal penalties:

Signature:	Print Name: Matt Francis	Date: 05/09/12

CDPH&E use only

Reviewed by: JWA, CLB, WTB, RWJ, RCL & LAS	Form of Payment & #	[Code]

Date: Approved____ Denied____ Additional Provision(s)? YES (see below) NO

Note: This variance is null and void if all additional provisions are not met.

URS

Date: April 20, 2012

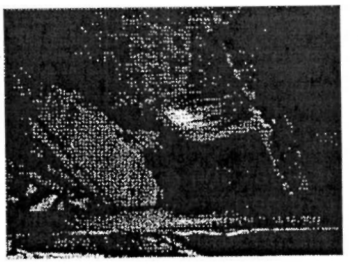
To: Matt Francis, Sr. Project Manager, Environmental Restoration, LLC (ER)

From: Andy Paddock, P.E. , URS Structural Engineer

Subject: **Eaton Sugar Beet Factory, Structural Recommendations No. 2**

URS was asked to meet with ER staff at the project site on April 16, 2012 and to provide structural assistance with the assessment of the existing floor structure within the Main Mill Building, where ER planned to utilize a heavy (3,000 lb. plus) motorized electric pallet jack to aid with debris material removal throughout the building. The areas observed focused on the 2nd ,3rd, and 4th floors of the Main Mill building where existing walkways, running north and south along the building, are planned to be used as "haul routes" to remove debris. Zone 3a ~~of the Kiln Building~~ Remove and zone 2 ~~of the East Metal-Sided Boiler Building~~ Remove were also observed.

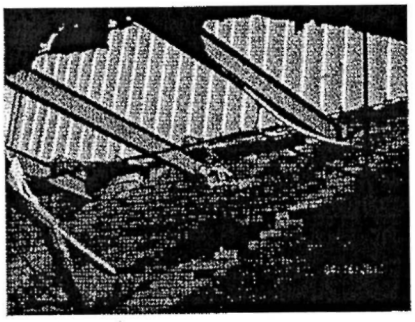
The deterioration observed throughout the floors of the Main Mill Building typically consisted of deteriorated concrete and exposed, corroded steel wire reinforcing. This deterioration is likely due to continued exposure to moisture which corroded the steel and damaged/delaminated the concrete cover on the underside of the slabs. This type of deterioration has an impact on the slabs structural capacity, specifically with regard to resisting punching shear from large point loads applied over a small area. Evidence of this can be seen in the photographs below and is the main reason it is not recommended to use the electric pallet jack on these floors.

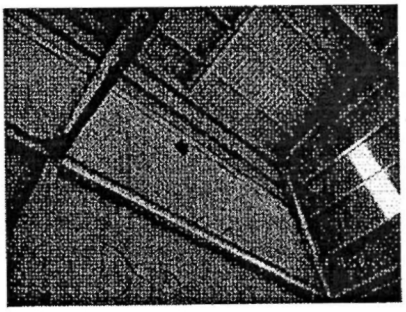


Specific Info

Do not use pallet jack on floors with exposed reinforcing. Floor areas with exposed wire reinforcing, or those suspected of having corroded reinforcing, should be accessed with caution and if concentrated point loads in excess of foot traffic are expected, supplemental measure should be taken. These measures need to provide some level of "redundancy" or "support" to keep something from creating or falling through a hole in the concrete slabs and could consist of sheets of plywood or expanded wire mesh panels spanning over the steel support beams below.

Zone 3a ~~of the Kiln Building~~, adjacent to Zone 2 ~~of the East Metal-Sided Boiler Building~~, was observed due to concern about the roof structure and its supporting masonry wall. The wall in question is at the south end of Zone 3a, and abuts the metal building framing of Zone 2. As shown in the photograph below, this load bearing wall is supporting the steel beams which support the concrete roof deck.





Zone 3a is very unstable and should be considered structurally unsound. Implementation of abatement work may endanger personnel who will be removing asbestos from the facility. Additional load and vibrations on or near this wall may result in collapse of the wall which is already partially collapsed and leaning into Zone 2. Temporary shoring should be located under each steel roof beam, and continued below the floor to the slab on grade in Zone 3 below, before any work is done in this area. Care should be taken when working in this area to ensure that personnel are in Zones 2 and Zone 3 are not injured should the wall collapses and drop bricks below.

cc: Jeremiah Ervin, Senior Environmental Scientist, URS
Peter Stevenson, EPA

Colorado Department of Public Health and Environment
Air Pollution Control Division
Asbestos Compliance and Assistance Group

Structurally Unsound Building Variance Request Checklist

Required Notifications

- ☐ Need to apply for an Abatement Permit with appropriate fee.
- ☐ Need to apply for a Demolition Notice with the proper fee.
- ☐ Need to apply for a Variance with a $50 fee.

Introduction

■ Please describe the type of structure, its location, and the intent of work operation. ■ Please include any information that will be helpful in understanding the overall project including but not limited to, history of the structure, what caused the structure to require the variance, the types of material, any surrounding structures that may be affected and any pictures that would be of help determining the acceptance of the variance. ■ Please include a diagram and pictures of the site.

Site Preparation and Personnel

- ☐ Regulated Area – Describe the regulated area including the location of the signage, fencing and poly, warning tape, any blockages such as streets or sidewalks.
- ☐ Training - Need to have all persons within the regulated area trained and certified, including the equipment operators.
- ☐ Entry and Exit to the site – Describe the procedures to enter and exit the regulated area including but not limited to, use of a decon unit or alternate procedures and how entry and exit will be monitored.
- ☐ Decontamination – ■ Describe the decontamination practices, use, and how the workers will decon the clothing and tools. ■ Describe how the decon of large equipment will be done.
- ☐ Protective Equipment - Describe the protective equipment used by the workers. (No street clothes under protective suites)
- ☐ Berm –Describe the construction, use, deconstruction and daily inspection of the berm.
- ☐ Critical Barriers – ■ Describe the location and use of any critical barriers used, including adjacent structures. ■ Describe the protections that will be used for structures adjacent to the demo area.
- ☐ Utilities – describe the site utility shut offs and any lock-out/tag-out methods used.

Transportation

- ☐ Trucks/Dumpsters – Describe who will inspect the trucks/dumpsters after loading and sealing with poly.
- ☐ ■ Describe the procedures if ACM is found on the exterior of the trucks/dumpsters.
- ☐ ■ Describe the procedure if a breach occurs in the waste disposal container(s) in the trucks/dumpsters. Trucks/dumpsters shall be equipped with a leak-proof waste container that will not rupture during loading, transporting or the act to deposition at the landfill. It is recommended that a layer of polyethylene line the bottom of the truck/dumpster to assist in sliding the waste container out of the truck/dumpster.
- ☐ ■ Describe the construction and use of a loading pad for the trucks/dumpsters.
- ☐ ■ Landfill - Describe the unloading procedures at the landfill.
- ☐ ■ Describe the contingency plan for spills during loading and unloading.

Removal of Contaminated Debris

- ☐ Describe the entire demo process and the equipment used to accomplish the demo including how the truck will be loaded. Describe the equipment that will remain inside the fenced area until decontamination is complete.

Structurally Unsound Building Variance Request Checklist

☐ Wetting - Describe the wetting of the debris field. ■ Describe the use of wetting where the demo equipment is contacting the debris (such as where a bucket of a back hoe/ track hoe contacts the material) ■ Describe the construction and use of a wetting bar, if used.

☐ Describe the procedures for the discovery of friable material if found.

Work Practice Changes

☐ Describe the procedures for a change in work practices such as changes to the work when the MAAL has been exceeded.

Disposal

☐ Describe the disposal methods including how the waste will be packaged.

Wind

☐ Include the stop work procedures when a sustained wind exceeding 12 mph is encountered. Describe procedures when wind gusts exceed 20 mph. Language should read something like this:

- Wind Speed Shutdown and Resume Conditions - All wind speed measurements shall be taken outside any windscreens in locations in close proximity to, and representative of, the work area in which the material is being handled.
  - Shutdown conditions- removal/disturbance operations shall immediately and temporarily cease when one or more of the following 4 conditions have been met:
    - any wind gust reaching or exceeding 20 miles per hour as determined by hand-held instruments;
    - sustained wind speeds reaching or exceeding 12 mph averaged over a period of 10 minutes;
    - winds are producing visible emissions or creating movement of dust or debris in or near the removal/disturbance area, or
    - winds are impacting on the ability of engineering controls to work as designed.
  - During wind-related work shutdowns, other work activities not involving removal or disturbance (e.g., lining dumpsters) may continue.
  - After a Wind Shut Down: Resume Conditions - Disturbance activities may resume after all of the following 4 conditions have been met:
    - all wind gust readings for a period of 20 minutes drop below 20 miles per hour as determined by hand-held instruments;
    - sustained wind speeds are below 12 mph averaged over a period of 20 minutes;
    - winds are no longer producing visible emissions or creating movement of dust in or around the removal/disturbance area, and
    - winds are not impacting on the ability of engineering controls to work as designed.

Air Monitoring and Visual Inspection

☐ Describe in detail: the air monitoring to be used, the approximate locations on site (point of operations and/or perimeter), the number of air samples to be collected, a description of the analytical method(s) (PCM/TEM) and how the results will be interpreted.

☐ Describe the contingency plan when the air sampling detects an asbestos fiber release. How and when will CDPHE be notified of detectable asbestos fiber releases?

☐ Describe in detail any clearance sampling procedures, if applicable.

☐ Describe in detail the final visual clearance procedures used by the AMS/Inspector.